



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

JUN 28 2012

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Ronald D. Croatti, President and CEO
Unifirst Corporation
68 Jonspin Road
Wilmington, MA 01887

Re: Clean Air Act Reporting Requirement

Dear Mr. Croatti:

The United States Environmental Protection Agency, Region 1 ("EPA"), is issuing Unifirst Corporation ("Unifirst") the enclosed Reporting Requirement ("RR") to evaluate Unifirst's compliance with the federal Clean Air Act ("the Act"), 42 U.S.C. § 7401 et. seq., and its implementing regulations. These legal requirements include, but are not limited to, portions of the EPA-approved, federally-enforceable state implementation plans ("SIPs") for the Commonwealth of Massachusetts (310 CMR 7.00 et. seq.) and the states of Maine (Chapter 115), Connecticut (22a-174 et. seq.) and New Hampshire (Env-A 600 et. seq.), relating to new source preconstruction permitting requirements.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act and its implementing regulations. This letter requires Unifirst to provide specific information about operations at certain of its New England facilities.

Specifically, within 60 days of receiving this letter, Unifirst is required to provide the following information about each Unifirst facility in New England that launders or has laundered towels (unless otherwise specified), including but not limited to those located at: 78-80 East Cottage Street in Dorchester, MA ("the Dorchester facility"); 8 Industrial Park Drive in Nashua, NH ("the Nashua facility"); 295 Parker Street in Springfield, MA ("the Springfield facility"); 430 Riverside Industrial Parkway in Portland, ME ("the Portland facility"); 205 Garfield Avenue in Stratford, CT ("the Stratford facility"); and 125 Etna Road in Lebanon, NH ("the Lebanon facility"). The term "towels" means shop, print, or furniture towels of the types used by commercial or industrial businesses to remove oils and/or solvents from machinery, equipment, and furniture. Where appropriate submit responses in an electronic format that is compatible with Microsoft Excel. Provide a separate response for each Unifirst location.

1. During a pre-test meeting at the Unifirst facility in Portland, Maine on June 13, 2012, Unifirst personnel informed EPA representatives that Unifirst is no longer laundering print towels at many of its facilities. As a follow-up to the meeting, Unifirst provided EPA with copies of two memos, dated November 7, 1997 and November 9, 2010, which discuss Unifirst print and furniture towel policies. Provide copies of any other written policies, directives, memos, reports, and internal and external correspondence (including electronic correspondence) that discuss limiting or ceasing the laundering of print and/or furniture towels, or sending such business to other facilities, issued or distributed since November 1, 2010.
2. Provide a list of all facilities in any of the six New England states where Unifirst currently operates or has operated in the past five years.
 - a. For each New England facility, indicate the number of active accounts that include print or furniture towels.
 - b. For each New England facility, describe the logistics associated with receiving and transporting soiled print or furniture towels at Unifirst's New England facilities. Specifically:
 - i. Describe how soiled print or furniture towels are received and transported within trucks (e.g., whether solely within individual customer bags, or in bags contained within bins, vats, barrels, drums, bays or other types of containment);
 - ii. Describe how and where soiled print or furniture towels are stored on-site once received at the Unifirst facility; and
 - iii. Indicate if print or furniture towels are laundered on site or if they are laundered at another location. If print or furniture towels are laundered at another location, specify where the towels are laundered. If Unifirst has a contract or agreement with another company to launder print or furniture towels, provide a copy of the contract or agreement.
 - c. For each facility in New England that launders or has laundered print or furniture towels, indicate the dates when each facility began, and if applicable, ceased, laundering print towels.
3. For each facility in New England that launders or has laundered towels, provide the following information in an electronic spreadsheet format that is compatible with Microsoft Excel:
 - a. The actual quantity (in pounds) of each type (print, furniture, or shop) of soiled towels received and processed (including laundering, drying, and/or shipment offsite) per month.
 - b. The first report shall cover the time period between July 1, 2011 and July 31, 2012. Unifirst shall continue to record the actual quantity (in pounds) of each type of towel received and processed per month. This data shall be compiled in a spreadsheet compatible with Microsoft Excel and submitted to EPA on a quarterly basis, beginning within 120 days of the date of receipt.

4. For each facility in New England that launders or has laundered towels, list each item of process equipment (e.g. extractors, aeration dryers) and process support equipment (e.g. boilers, compressors) costing above \$10,000 that Unifirst has installed since April 2011. Also, for each such piece of equipment, provide the following information:
 - a. The purpose/role of the equipment;
 - b. The cost and date of purchase;
 - c. The date installation was completed;
 - d. The date the equipment began operating; and
 - e. The name of the manufacturer, model number, size, maximum production rate, and any other operational specifications.
 - f. Information pertaining to any emission control devices associated with such process equipment, including the type of emission control device, when such device was installed, and any data pertaining to emission reductions from use of such device.
5. Provide copies of all correspondence Unifirst (or any of its predecessors) has had with state and federal environmental agencies regarding air emissions at New England facilities since April 2011, including copies of:
 - a. All permits issued;
 - b. All permit applications; and
 - c. Any requests for permit modifications.

Mail the submissions required by this letter to:

Susan Studlien, Director
Office of Environmental Stewardship
5 Post Office Square, Suite 100, OES04-2
Boston, MA 02109-3912
Attn: Elizabeth Kudarauskas, Air Technical Unit

Be aware that if Unifirst does not provide the requested information, EPA may order Unifirst to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law also establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

If you have any questions regarding this reporting requirement, please contact Elizabeth Kudarauskas, Environmental Engineer at (617) 918-1564 or have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,



Susan Studlien, Director
Office of Environmental Stewardship

cc:

Bill Osbahr, EPA, OEME
Robert Girard, CT DEP
Pamela Monroe, NH DES
Kurt Tidd, ME DEP
Ed Pawlowski, MassDEP, Northeast Regional Office
Saadi Motamedi, MassDEP, Western Regional Office